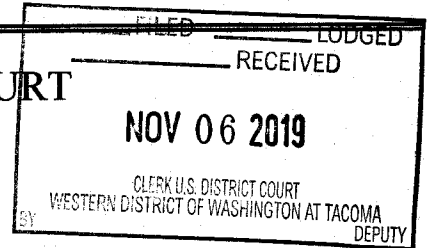


AO 106A (08/18) Application for a Warrant by Telephone or Other Reliable Electronic Means

## UNITED STATES DISTRICT COURT

for the

Western District of Washington



In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

SUBJECT PREMISES in Vancouver, WA;

2 SUBJECT VEHICLES, Mercedes and Toyota;

3 SUBJECT STORAGE UNITS in Lacey, Kelso, and  
Vancouver, WA; and SUBJECT PO BOX in Vancouver, WA

Case No.

MJ19-5227

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

SUBJECT PREMISES in Vancouver, WA; 2 SUBJECT VEHICLES, Mercedes and Toyota; 3 SUBJECT STORAGE UNITS in Lacey, Kelso, and Vancouver, WA; and SUBJECT PO BOX in Vancouver, WA; as further described in Attachment A.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, which is attached hereto and incorporated herein by this reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

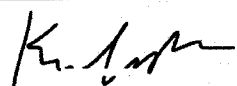
The search is related to a violation of:

Code Section	Offense Description
Title 21, U.S.C. § 841	Possession of Controlled Substance with Intent to Distribute

The application is based on these facts:

See attached Affidavit

- ☒ Continued on the attached sheet.  
☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

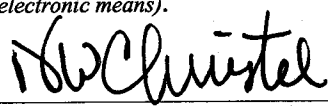
Kimberly Myhrer, US Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
Telephone (specify reliable electronic means).

Date:

11-6-19

  
Judge's signature

City and state: Tacoma, Washington

DAVID W. CHRISTEL, U.S. MAGISTRATE JUDGE

Printed name and title

**ATTACHMENT A1**  
**Premises to be searched**

SKYBERG's residence located at 7603 NE 13<sup>TH</sup> Ave, Lot 120, Vancouver,  
Washington 98665 and associated curtilage (hereinafter "SUBJECT PREMISES")

ATTACHMENT A1  
ITEMS TO BE SEIZED

**ATTACHMENT A2**  
**Vehicle to be Searched**

A white 2015 Mercedes Benz SD with Washington license plate BHF6374 and vehicle identification number (VIN) WDDSJ4EB3FN213498, registered to SKYBERG (hereinafter "SUBJECT VEHICLE 1")

ATTACHMENT A2  
ITEMS TO BE SEIZED

**ATTACHMENT A3**  
**Vehicle to be Searched**

A white 2012 Toyota FJ Cruiser with Washington license plate BHR4637 and vehicle identification number (VIN) JTEBU4BF0CK146246, registered to SKYBERG (hereinafter "SUBJECT VEHICLE 2")

ATTACHMENT A3  
ITEMS TO BE SEIZED

**ATTACHMENT A4**

**Place to be Searched**

Storage unit # 259 at Express Storage, 5200 Lacey Blvd SE, Lacey, WA  
98504, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 1")

ATTACHMENT A4  
ITEMS TO BE SEIZED

**ATTACHMENT A5**  
**Place to be Searched**

Storage unit # D245 at Northwest Self Storage, 1699 13<sup>th</sup> Ave S, Kelso, WA  
98626, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 2")

ATTACHMENT A5  
ITEMS TO BE SEIZED

**ATTACHMENT A6**  
**Place to be Searched**

Storage unit #B190 at Northwest Self Storage, 7523 NE Hwy 99 Suite A, Vancouver,  
WA 98665, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 3")

ATTACHMENT A6  
ITEMS TO BE SEIZED

**ATTACHMENT A7**

**Place to be Searched**

A Post Office Box 239 located at 7720 NE Hwy 99, D, Vancouver, Washington  
98665, currently being used by SKYBERG (hereinafter "SUBJECT PO BOX")

ATTACHMENT A7  
ITEMS TO BE SEIZED



**ATTACHMENT B**  
**Items to be Seized**

The following items that constitute evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section 841(a)(1), possession of controlled substances with intent to distribute:

1. Controlled substances and controlled substance analogues, including, but not limited to, synthetic cathinones, synthetic cannabinoids, cocaine, crack cocaine, heroin, hashish, marijuana, methamphetamine, MDMA, methadone, oxycodone, and Oxycotin;

2. Monetary instruments, including but not limited to, currency, money orders, bank checks, or gift cards;

3. Bank and financial account information including bank statements, deposit tickets, canceled checks, certificates of deposits, safe deposit box rental agreements and entrance logs, credit card statements and financial statements for domestic and foreign bank accounts, copies of money orders and cashier's checks, records reflecting domestic and/or international wire transfers, and records reflecting cryptocurrency transactions;

3. Controlled substance-related paraphernalia;

4. Documentary evidence, in whatever form, relating to the purchase, sale, and/or distribution of controlled substances;

5. Documents and other items tending to show the existence of other stored drugs, including rental agreements, receipts, keys, notes, and maps specially concerning off-site storage rooms and/or lockers;

6. Notes, letters and other items which communicate information identifying the sender and/or recipient or pertaining to the contents of the mailing;

7. Any evidence of the use of the US Mails in the distribution of controlled substances including, but not limited to, receipts, money orders, shipping labels and packaging materials, postal money orders, and/or DVD cases;

8. Address books, daily logs, daily telephone diaries, calendars, and appointment books;

ATTACHMENT B  
ITEMS TO BE SEIZED

1       9.     Digital computing devices, *e.g.*, desktop and laptop computers, digital  
2 storage devices, *e.g.*, external hard drives and USB thumb drives, and optical and  
3 magnetic storage media, *e.g.*, Blue Ray discs, DVDs and CDs.

4       10.    Weapons to include rifles, shotguns, knives, and handguns, as well as  
5 ammunition, shell casings, bullets, magazines, cleaning equipment, holsters, gun boxes  
6 and cases, trigger locks, gun safes, gun parts and tools, targets, receipts, and bills of sale;

7       11.    Cellular telephones and other communication devices including Blackberry,  
8 Android, Galaxy, iPhone, iPad and similar devices, may be seized and searched for the  
9 evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section  
10 841(a)(1), possession of controlled substances with intent to distribute, including the  
11 following items:

12           a.     Assigned number and identifying telephone serial number (ESN,  
13 MIN, IMSI, or IMEI);

14           b.     Stored lists of recent received, sent, or missed calls;

15           c.     Stored contact information;

16           d.     Photographs related to the aforementioned crimes of investigations,  
17 or photographs that may show the user of the phone and /or co-conspirators, including  
18 any embedded GPS data associated with the photographs;

19           e.     Stored text messages related to the aforementioned crime of  
20 investigations, including Apple messages, Blackberry Messenger messages or other  
21 similar messaging services or applications where the data is stored on the telephone;

22           f.     Notes; draft, sent, and received emails related to the aforementioned  
23 crimes of investigation;

24           g.     Evidence of user attribution showing who used or owned the digital  
25 device at the time of the things described in this warrant were created, edited, or delated,  
26 such as logs, phonebooks, saved usernames and passwords, documents and browsing  
27 history;

28           h.     Records of Internal Protocol addresses used and records of Internet  
activity, including firewall logs, caches, browsing history an cookies, "bookmarked" or  
"favorite" web pages, search terms the user entered into any Internet search engine, and  
records of user-typed web address.

ATTACHMENT B  
ITEMS TO BE SEIZED

1 As used above, the terms "records" and "information" included all of the  
2 foregoing items of evidence in whatever form and by whatever means they may have  
3 been created or stored, including any form of computer or electronic storage (such as  
4 flash memory or other media that can store data) and any photographic form, including  
5 emails, photographs, text messages, information contained in application or "apps," and  
6 calendar entries.

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28 ATTACHMENT B  
ITEMS TO BE SEIZED

**STATE OF WASHINGTON**           )  
   )       **SS**  
**COUNTY OF CLARK**               )

I, KIMBERLY MYHRER, being first duly sworn on oath, depose and say:

## BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS), and have been so employed since May 2015. I am currently assigned to the Prohibited Mailing Narcotics/Miscellaneous Team in Seattle, Washington, Seattle field office. My job training specializes in the investigation of the use of the U.S. mail to facilitate illegal activities. During the course of my employment with the USPIS, I have participated in numerous criminal investigations involving illegal and non-mailable items, including controlled substances.

2. Through my training and experience, I have become familiar with the methods employed by narcotics traffickers, in particular, methods involving smuggling, safeguarding and distributing narcotics, and collecting and laundering narcotics-related proceeds. These methods include the use of the mail system, public telephones, wireless communication technology, counter surveillance, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, and the use of coded or vague communications in an attempt to avoid detection by law enforcement and to circumvent narcotics investigations.

## PURPOSE OF AFFIDAVIT

3. This affidavit is submitted in support of an application for a search warrant in the Western District of Washington to search HARLEY SKYBERG's residence and associated curtilage, vehicles, storage units, and PO box more particularly described below and in Attachments A1 through A7:

a. SKYBERG's residence located at 7603 NE 13<sup>TH</sup> Ave, Lot 120, Vancouver, Washington 98665 and associated curtilage (hereinafter "SUBJECT PREMISES");

1           b.     A white 2015 Mercedes Benz SD with Washington license plate  
2 BHF6374 and vehicle identification number (VIN) WDDSJ4EB3FN213498, registered to  
3 SKYBERG (hereinafter "SUBJECT VEHICLE 1");

4           c.     A white 2012 Toyota FJ Cruiser with Washington license plate  
5 BHR4637 and vehicle identification number (VIN) JTEBU4BF0CK146246, registered to  
6 SKYBERG (hereinafter "SUBJECT VEHICLE 2").

7           d.     Storage unit #259 at Express Storage, 5200 Lacey Blvd SE, Lacey,  
8 WA 98504, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 1");

9           e.     Storage unit #D245 at Northwest Self Storage, 1699 13<sup>th</sup> Ave S,  
10 Kelso, WA 98626, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT  
11 2");

12           f.     Storage unit #B190 at Northwest Self Storage, 7523 NE Hwy 99  
13 Suite A, Vancouver, WA 98665, occupied by SKYBERG (hereinafter "SUBJECT  
14 STORAGE UNIT 3"); and

15           g.     A Post Office Box 239 located at 7720 NE Hwy 99, D, Vancouver,  
16 Washington 98665, currently being used by SKYBERG (hereinafter "SUBJECT PO  
17 BOX").

18           4.     As set forth below, there is probable cause to believe that a search of the  
19 above-listed residence, vehicles, storage units, and PO Box will reveal evidence of  
20 violations of Title 21, United States Code, Sections 841(a)(1)(distribution and possession  
21 with intent to distribute a controlled substance).

22           5.     The items to be seized are described in detail in Attachment B, incorporated.  
23 These items consist of evidence, fruits, and instrumentalities of violations of Title 21,  
24 United States Code, Sections 841(a)(1) (distribution and possession with intent to  
25 distribute a controlled substance).

26           6.     The facts set forth in this Affidavit are based on my personal knowledge;  
27 knowledge obtained from others during my participation in this investigation, including  
28 other law enforcement officers; review of documents and records related to this  
investigation; communications with others who have personal knowledge of the events  
and circumstances described herein; and information gained through my training and  
experience. Because this Affidavit is submitted for the limited purpose of establishing

1 probable cause in support of the application for a search warrant, it does not set forth  
2 each and every fact that I or others have learned during the course of this investigation.

3 **BACKGROUND ON SYNTHETIC DRUGS AND CONTROLLED SUBSTANCE**

4 **ANALOGUES**

5 **A. Synthetic Cathinones**

6 7. Synthetic cathinones, often known as “bath salts,” are human-made  
7 stimulants chemically related to cathinone, a substance found in the khat plant. Khat is a  
8 shrub grown in East Africa and southern Arabia, where some people chew its leaves for  
9 their mild stimulant effects. Human-made versions of cathinone can be much stronger  
10 than the natural product. Synthetic cathinones usually take the form of a white or brown  
11 crystal-like powder. People typically swallow, snort, smoke, or inject synthetic  
12 cathinones.

13 8. Synthetic cathinones have been reported to produce effects that include  
14 paranoia, hallucinations, panic attacks, and excited delirium that causes extreme agitation  
15 and violent behavior.

16 9. Synthetic cathinones can be addictive. Animal studies show that rats will  
17 compulsively self-administer synthetic cathinones. Human users have reported that the  
18 drugs trigger intense, uncontrollable urges to use them again. Taking synthetic cathinones  
19 can cause strong withdrawal symptoms that include depression, anxiety, tremors,  
20 sleeping problems, and paranoia.

21 10. Synthetic cathinones are typically sold in small plastic or foil packages,  
22 sometimes with a label stating “not for human consumption,” in an attempt to circumvent  
23 the Federal Analogue Act, which forbids selling drugs that are substantially similar to  
24 drugs already scheduled for human use. While most commonly referred to as or labeled  
25 “bath salts,” synthetic cathinones can also be referred to as and labeled “plant food,”  
26 “jewelry cleaner,” “insect repellent,” and other similar such names. Drug traffickers  
27 market synthetic cathinones under various exotic brand names such as “Bliss,” “Cloud  
28 Nine,” “Lunar Wave,” “Vanilla Sky,” and “White Lightning.”

11. There are different types of synthetic cathinone with varying chemical compositions. One such type of synthetic cathinone is alpha-Pyrrolidinopentiophenone, also known as alpha-PVP. Alpha-PVP is chemically similar to other synthetic cathinones and takes the form of a white or pink, foul-smelling crystal that can be eaten, snorted, injected, or vaporized in an e-cigarette or similar device. Vaporizing, which sends the drug very quickly into the bloodstream, may make it particularly easy to overdose. Like other drugs of this type, alpha-PVP can cause excited delirium that involves hyper-stimulation, paranoia, and hallucinations that can lead to violent aggression and self-injury. The drug has been linked to deaths by suicide as well as a heart attack. It can also dangerously raise body temperature and lead to kidney damage or kidney failure.

12. In March 2014, the Drug Enforcement Administration (DEA) issued an order temporarily placing alpha-PVP into Schedule I. *See* 79 FR 12938, Mar. 7, 2014. In March 2016, DEA issued an order extending the temporary placement of alpha-PVP in Schedule I. *See* 81 FR 11429, Mar. 4, 2016. In March 2017, DEA issued a final rule placing alpha-PVP into Schedule I. *See* 82 FR 12171, Mar. 1, 2017.

**B. Synthetic Cannabinoids**

13. Synthetic cannabinoids are human-made mind-altering chemicals that are either sprayed on dried, shredded plant material to be smoked or sold as liquid to be vaporized and inhaled in e-cigarettes and other devices.

14. Synthetic cannabinoids are sometimes misleadingly called “synthetic marijuana” (or “fake weed”) because they act on the same brain cell receptors as THC, the mind-altering ingredient in marijuana. However, synthetic cannabinoids may affect the brain much more powerfully than marijuana; their actual effects can be unpredictable and, in some cases, more dangerous or even life-threatening.

15. Manufacturers sell these products in colorful foil packages and plastic bottles to attract consumers. They market these products under a wide variety of specific brand names. Hundreds of brands now exist, including K2, Spice, Joker, Black Mamba, Kush, and Kronic.



16. Synthetic cannabinoid users report some effects similar to those produced by marijuana, including elevated mood, relaxation, altered perception, and symptoms of psychosis. Synthetic cannabinoids can also cause serious mental and physical health problems including rapid heart rate, vomiting, violent behavior, and suicidal thoughts. In addition, the psychotic effects of synthetic cannabinoids could include extreme anxiety, confusion, paranoia, and hallucinations.

17. Synthetic cannabinoids can be addictive. Regular users trying to quit may experience various withdrawal symptoms. Behavioral therapies and mediations have not specifically been tested for the treatment of addiction to these products. Because the chemicals used in them have no medical benefit and a high potential for abuse, authorities have made it illegal to sell, buy, or possess some of these chemicals. Some synthetic cannabinoids have been federally scheduled as well.

### **C. Controlled Substance Analogues**

18. A controlled substance analogue is a “designer drug” that resembles a controlled substance in molecular structure and actual (or purported) physiological effect. In response to a growing problem of individuals, especially chemists, creating or designing substances acted on the body like controlled substances but were not yet listed on controlled substances schedules, Congress passed the Controlled Substance Analogue Enforcement Act of 1986.

19. 21 U.S.C. § 813(a) states that “[a] controlled substance analogue shall, to the extent intended for human consumption, be treated, for the purposes of any Federal law as a controlled substance in Schedule I [of the Controlled Substances Act].”

20. Pursuant to 21 U.S.C. § 802(32)(A), if a substance meets the following criteria, it constitutes a controlled substance analogue subject to control as if it was a scheduled controlled substance:

- a) The substance has a chemical structure which is substantially similar to the chemical structure of a controlled substance in schedule I or II; and
- b) Either:



i) The substance has a stimulant, depressant, or hallucinogenic effect on the central nervous system that is substantially similar to or greater than the stimulant, depressant, or hallucinogenic effect on the central nervous system of a controlled substance in schedule I or II; or

ii) A person represents or intends the substance to have a stimulant, depressant, or hallucinogenic effect on the central nervous system that is substantially similar to or greater than the stimulant, depressant, or hallucinogenic effect on the central nervous system of a controlled substance in schedule I or II; and

c) The substance is intended for human consumption.

#### **STATEMENT OF PROBABLE CAUSE**

##### **A. Initial Seizure of SKYBERG's Parcels in Chehalis, WA in January 2014**

21. On January 15, 2014, Postal Inspector Bryce Dahlin received 15 Priority Mail parcels from the Chehalis Post Office in Chehalis, WA, as potentially suspicious. All 15 parcels listed the sender as "Harley Skyberg, 658 Lafayette, Chehalis, WA 98532." On January 23, 2014, Inspector Dahlin received consent from the intended recipient for one of the 15 parcels to open the parcel. The parcel had a Collect on Delivery (COD) label<sup>1</sup> with serial number M464377167. Inside the parcel were four individually wrapped containers containing brown and white powdery substances. The substances were labeled "No Bull Bath Salt," "Thundercats Party Powder," and "Mr. Nice Guy Powder Bath Salt." In addition, there was a clear baggie containing a white powder labeled "Skull Candy."

22. The USPIS obtained a federal search warrant to open the remaining fourteen parcels. Inside the parcels were containers and packages containing similar powdery substances with labels such as "Eight Ballz," "George Dubya," and "High

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<sup>1</sup> With COD, a mailer sends an item to a recipient who pays for the item and its postage when the item is delivered. In SKYBERG's case, I have learned that customers typically submit postal money orders to claim their parcels containing the controlled substance and/or controlled substance analogue they have ordered from [www.wickedherbals.guru](http://www.wickedherbals.guru), as further described below. The post office who received the money order then sends it to SKYBERG via the US mail.

1 Octane.” Some of the seized substances were sent to the USPIS Forensic Laboratory  
2 Services in Dulles, VA for analysis. The resulting lab report indicated that the seized  
3 substances contained, among other things, alpha-PVP, methylone, and/or ethylone.  
4 According to DEA, methylone and ethylone are both types of synthetic cathinone.

5 **B. Three SKYBERG Parcels Seized in Chehalis, WA in April 2016**

6 23. On April 1, 2016, the Chehalis Post Office forwarded a Priority Express  
7 Mail parcel addressed to “Khaleesi Jhonson, 500 Gilman Blvd, Issaquah, WA 98027” to  
8 the USPIS as potentially suspicious. The parcel listed the sender as “Harley Skyberg, PO  
9 Box 1163, Chehalis, WA 98532” and had a COD label requesting a payment of \$175.36.  
10 In addition, the parcel had a mailing label with a date of March 23, 2016. The delivery  
11 confirmation number associated with the parcel was M477069103.

12 24. Postal Inspector France Bega, who received the parcel from the Chehalis  
13 Post Office, researched “Harley Skyberg” on USPIS databases and found that similar  
14 parcels sent by him in 2014 contained controlled substances.

15 25. On April 5, 2016, Inspector Bega contacted the Chehalis Post Office to  
16 request any information that the post office had in its records regarding SKYBERG. The  
17 post office found an “Application for Post Office Box” submitted by SKYBERG for PO  
18 Box 1163. The post office also informed Inspector Bega that SKYBERG had just  
19 dropped off 31 Priority Mail parcels to be mailed. All 31 parcels had COD labels, which,  
20 in total, requested approximately \$6,400 in payment from the recipients upon receipt of  
21 the parcels. Inspector Bega asked the Chehalis Post Office to forward three of the 31  
22 parcels to him and process the remaining parcels according to their respective mailing  
23 labels.

24 26. On April 8, 2016, Inspector Bega received the three Priority Mail parcels  
25 that he had requested. One of the three parcels was addressed to “Beau Schmidt, 6095  
26 Lake Street, Indian River, MI 49749.” The parcel listed the sender as “Harley Skyberg,  
27 PO Box 1163, Chehalis, WA 98532” and had a COD label requesting a payment of  
28

1 \$165.15. In addition, the parcel had a mailing label with a date of April 5, 2016. The  
2 delivery confirmation number associated with the parcel was M477071332.

3 27. Another one of the three parcels was addressed to "Donald Miller, 362  
4 North Street, Standish, MI 48658." The parcel listed the sender as "Harley Skyberg, PO  
5 Box 1163, Chehalis, WA 98532" and had a COD label requesting a payment of \$204.65.  
6 In addition, the parcel had a mailing label with a date of April 5, 2016. The delivery  
7 confirmation number associated with the parcel was M477071364.

8 28. I researched the recipients' names and addresses and found the following:

9 a. "500 Gilman Blvd, Issaquah, WA 98027" was not a true and  
10 deliverable address, and the name "Khaleesi Jhonson" was not associated with that  
11 address. However, "Khaleesi Jhonson" was associated with a nearby address of "100  
12 Gilman Blvd NE, Issaquah, WA 98027."

13 b. "6095 Lake Street, Indian River, MI 49749" was a true and  
14 deliverable address, but the name "Beau Schmidt" was not associated with the address.

15 c. "362 North Street, Standish, MI 48658" was a true and deliverable  
16 address, but the name "Donald Miller" was not associated with the address.

17 29. Based on my training and experience, I knew that recipient addresses listed  
18 on Priority Mail parcels containing controlled substances were often fictitious. I also  
19 knew that recipient names on Priority Mail parcels containing controlled substances were  
20 often not associated with the corresponding addresses. This is typically done in an effort  
21 to conceal the identities of the individuals involved.

22 30. On April 18, 2016, I obtained a federal search warrant from United States  
23 Magistrate Judge Brian A. Tsuchida for the three parcels described above—the parcels  
24 addressed to "Khaleesi Jhonson," "Beau Schmidt," and "Donald Miller"—and opened  
25 them.

26 31. The parcel addressed to "Khaleesi Jhonson" contained five round vials  
27 labeled "Snowman" containing white powdery substances. It also contained an invoice  
28 for five "SNOWMAN 2 ULTRA STRONG RESEARCH CHEMICAL POWDER .5G."

1 The invoice date was March 22, 2016. The substances were sent to the USPIS Forensic  
 2 Laboratory Services in Dulles, VA for analysis. The lab report indicated that the  
 3 substances contained alpha-PVP.

4 32. The parcel addressed to "Beau Schmidt" contained four small packages  
 5 with a Superman logo and labeled "Multi-purpose solution," one small package labeled  
 6 "AMPED" with a description that said "Ladybug Attractant," and one small package  
 7 labeled "White Water Rapid" with a description that said "Exuberance Powder; Ladybug  
 8 Attractant." It also contained a similar invoice dated April 5, 2016. In addition, the parcel  
 9 contained two black business cards advertising, among other things, "Research  
 10 Chemicals" and "Party Pills" and website "www.wickedherbals.guru." All seized  
 11 substances were sent to the USPIS Forensic Laboratory Services in Dulles, VA for  
 12 analysis. The lab report indicated that they all contained alpha-PVP.

13 33. The parcel addressed to "Donald Miller" contained one small package with  
 14 a Superman logo and labeled "Multi-purpose solution," one small package with a  
 15 description that said "Capet Stain Remover," one small package labeled "Zombie Eat  
 16 Flesh," one vial labeled "Wicked Yeti," one vial labeled "High Octane," and one vial  
 17 labeled "Drone." It also contained a similar invoice dated April 4, 2016. In addition, it  
 18 contained two pink business cards advertising "www.wickedherbals.guru" and listing  
 19 "Guru Harley" as the "Owner/Operator" of the website. All seized substances, except for  
 20 "Zombie Eat Flesh," were sent to the USPIS Forensic Laboratory Services in Dulles, VA  
 21 for analysis. The lab report indicated that all the substances contained alpha-PVP.

22 **C. One SKYBERG Parcel Seized in Michigan in May 2016**

23 34. On May 2, 2016, postal employees forwarded suspicious Priority Mail  
 24 parcel 9403311699000891785773 going to "Beau Schmidt" in Kalamazoo, MI, to Postal  
 25 Inspector Mark Dayhuff in the USPIS Detroit Division. The parcel had a return address  
 26 of "Harley Skyberg, PO Box 1163, Chehalis, WA 98532." Inspector Dayhuff contacted  
 27 the recipient on the phone and obtained verbal consent to open the parcel. Inside the  
 28 parcel were two vials labeled "White Water Rapid" with a description that said

1 “Exuberance Powder; Ladybug Attractant,” one vial labeled “Research Chemical” and  
 2 containing a white powdery substance, and two black pouches with a description that said  
 3 “Carpet Stain Remover.” The contents seized from the parcel were sent to the USPS  
 4 Forensic Laboratory Services in Dulles, Virginia. The lab determined that “White Water  
 5 Rapid” and “Carpet Stain Remover” contained, among other things, alpha-PVP.

6 **D. One SKYBERG Parcel Seized in Pennsylvania in August 2016**

7 35. In August 2016, Postal Inspector Dave Heinke in the USPS Philadelphia  
 8 Division intercepted Priority Mail parcel 9403311699000114262050 with a return  
 9 address of “Harley Skyberg, PO BOX 1163, Chehalis, WA 98332.” Inspector Heinke  
 10 obtained verbal consent to open the parcel from the recipient. The parcel contained two  
 11 small pink packages labeled “Scooby Snax Potpourri” and one small red package labeled  
 12 “Mad Hatter Herbal Blend.” The parcel also contained an invoice similar to those found  
 13 in the parcels seized in April 2016, as well as black and pink businesses cards identical to  
 14 those found in those parcels.

15 36. The seized contents were sent to the USPS Forensic Laboratory Services  
 16 in Dulles, VA for analysis. The lab report indicated that the substances contained N-(1-  
 17 amino-3-methyl-1-oxobutan-2-yl)-1-(cyclohexylmethyl)-1H-indazole-3-carboxamide,  
 18 also known as AB-CHMINACA, a type of synthetic cannabinoid and federally controlled  
 19 Schedule I substance.<sup>2</sup>

20 **E. Two SKYBERG Parcels Seized in Pennsylvania in November and December**  
 21 **2016 and the Identification of SKYBERG’s Email Address**

22 37. On November 7, 2016, Postal Inspector Staci Johnson in the USPS  
 23 Pittsburg Division received a tip from a confidential informant that “bath salts” were  
 24 being shipped into the East Freedom, PA area via USPS COD services. Inspector  
 25  
 26

---

27 <sup>2</sup> In January 2015, DEA issued an order temporarily placing AB-CHMINACA into Schedule I. *See* 80 FR 5042, Jan.  
 28 30, 2015. In January 2017, DEA issued an order extending the temporarily placement of AB-CHMINACA in  
 Schedule I. *See* 82 FR 8590, Jan. 27, 2017. In October 2017, DEA issued a final rule placing AB-CHMINACA in  
 Schedule I.

1 Johnson intercepted Priority Mail COD parcel 9403311699000658732521 from the East  
2 Freedom Post Office based on the tip. The parcel listed the sender as "Harley Skyberg,  
3 P.O. Box 919, Chehalis, WA 98532" and was addressed to "Tammy Ritchey, 209 Back  
4 Street, East Freedom, PA 16637." Inspector Johnson's research showed that "209 Back  
5 Street, East Freedom, PA 16637" was a true and deliverable address, but that "Tammy  
6 Ritchey" was not currently associated with the address. The parcel also had a COD label  
7 requesting a payment of \$401.46 upon receipt.

8 38. Inspector Johnson was also informed by the East Freedom Post Office that  
9 two individuals, a male and a female, had come to the post office to claim the parcel and  
10 been turned away because they were trying to pay the COD with "starter checks," which  
11 was against USPS policy.

12 39. On November 14, 2016, the USPIS obtained a federal search warrant for  
13 the parcel. Inside the parcel was a small package labeled "Eight Ballz." Further inside the  
14 pouch was a vial containing a sticky brown substance. The substance was field-tested  
15 positive for a synthetic narcotic.<sup>3</sup>

16 40. On December 1, 2016, Inspector Johnson was notified by the East Freedom  
17 Post Office that another suspicious COD parcel from "Harley Skyberg, PO BOX 919,  
18 Chehalis, WA 98532," addressed to the same recipient, arrived. This parcel, identified as  
19 Priority Mail parcel 9405511699000491363038, was also seized and searched pursuant to  
20 a federal search warrant subsequently obtained by the USPIS. Inside the parcel were three  
21 plastic discs, each containing an off-white rock-like substance. The field test revealed that  
22 the rock-like substance was alpha-PVP.

23 41. After the search, Inspector Johnson conducted a controlled delivery of the  
24 parcel to the listed recipient's residence and interviewed the residents. After *Miranda*,  
25 one of the residents, Joseph Rininger, admitted that he had ordered "bath salts" from  
26 "wickedherbal.com" and used his girlfriend's name to receive the parcel. Rininger then  
27

28 <sup>3</sup> This particular field test kit utilized by the investigators lacked ability to tell what kind of synthetic narcotic was the substance that was being tested—it could only tell *whether* something was a synthetic drug or not.



1 showed Inspector Johnson an email invoice he had received from the website following  
 2 his purchase. This system-generated invoice was originally sent to  
 3 theharleyskyberg@gmail.com and informed theharleyskyberg@gmail.com that  
 4 "wickedherbals.guru" had received a new order from tammyritchey1@gmail.com. The  
 5 invoice was subsequently forwarded to harley1skyberg@gmail.com and then to  
 6 Rinniger's control.

7 42. On December 12, 2016, I conducted a Google search for the website  
 8 "Wickedherbal.com." Google returned a similar website "www.wickedherbals.guru". The  
 9 website had multiple products listed for sale. A Google search of "where to buy legal  
 10 bath salts online" returned "www.wickcedherbals.guru" twice as the search results on the  
 11 first page. I reviewed the products for sale on "www.wickedherbals.guru" and found  
 12 numerous products advertised as "legal bath salt."

13 **F. 46 SKYBERG Parcels Seized in Kelso, WA and Duncansville, PA in**  
 14 **February 2017**

15 43. On February 9, 2017, the Kelso Post Office in Kelso, Washington,  
 16 forwarded to me 45 COD Priority Mail parcels, mailed by SKYBERG as suspicious. All  
 17 45 parcels were addressed to different addresses throughout the country. However, all  
 18 had the same return address of "Harley Skyberg, PO BOX 675, Kelso, WA 98626." The  
 19 overwhelming majority of the 45 parcels had COD labels. All parcels had a profile that  
 20 was consistent with that of previously seized SKYBERG parcels.

21 44. On February 13, 2017, I received one additional COD Priority Mail parcel  
 22 M477167997, suspected of containing controlled substances. The parcel was intercepted  
 23 in transit in Duncansville, Pennsylvania, and was given to the USPIS as suspicious. The  
 24 parcel had a return address of "Harley Skyberg, PO BOX 919, Chehalis, WA 98532."

25 45. I obtained a federal search warrant on February 16, 2017 from United  
 26 States Magistrate Judge Brian A. Tsuchida for the 46 parcels. The contents inside the  
 27 parcels were exotically branded packages and vials that were either identical to or closely  
 28 resembled the contents of the previously seized parcels from SKYBERG.

1           46. Among the seized contents, I sent two substances labeled “Eight Ballz” and  
2 “George Dubya” to the USPIS Forensic Laboratory Services in Dulles, VA for analysis.  
3 On August 31, 2018, I received a report back from the lab. The report indicated that  
4 “Eight Ballz” contained, among other things, alpha-Pyrrolidinopropiophenone, also  
5 known as a-PPP, and 4-fluoro-a-pyrrolidinohexiophenone, also known as 4-F-a-PHP. The  
6 report also indicated that “George Dubya” contained, among other things, a-PPP.  
7 According to the report by the USPIS Forensic Laboratory Services, a-PPP and 4-F-a-  
8 PHP are structurally similar to alpha-PVP.

9 **G. Second Visit to [www.wickedherbals.guru](http://www.wickedherbals.guru)**

10           47. On February 12, 2017, I visited [www.wickedherbals.guru](http://www.wickedherbals.guru) and captured  
11 images of items sold on the website. Some of the items being advertised on the website  
12 were items that had been previously seized by the USPIS and tested positive for  
13 controlled substances. These items included “White Water Rapid Exuberance Powder,  
14 Ladybug Attractant .5G,” “AMPED Exuberance Powder Ladybug Attractant .5G,” and  
15 “Ultra Premium High Octane Research Chemical 500MG.”

16 **H. Additional Seizures of over 50 SKYBERG Parcels between August and**  
17 **December 2017**

18           48. On August 28, 2017, the Castle Rock Post Office located in Castle Rock,  
19 WA, forwarded six Priority Mail COD parcels to the USPIS as suspicious. All six parcels  
20 listed “Harley Skyberg, PO Box 919, Chehalis, WA 98532” as the sender. The profile of  
21 the forwarded parcels was consistent with the previous SKYBERG parcels that contained  
22 controlled substances and/or controlled substance analogues.

23           49. On September 6, 2017, the Castle Rock Post Office forwarded 11  
24 additional Priority Mail parcels to the USPIS as suspicious. All 11 parcels listed “Harley  
25 Skyberg, PO Box 919, Chehalis, WA 98532” as the sender, and nine of the 11 had COD  
26 labels. The profile of the forwarded parcels was consistent with the previous SKYBERG  
27 parcels that contained controlled substances and/or controlled substance analogues.  
28



1           50. On September 29, 2017, the Chehalis Post Office forwarded ten Priority  
2 Mail parcels to the USPIS as suspicious. All ten parcels listed "Harley Skyberg, PO Box  
3 919, Chehalis, WA 98532" as the sender, and seven of the ten parcels had COD labels.  
4 The profile of the forwarded parcels was consistent with the previous SKYBERG parcels  
5 that contained controlled substances and/or controlled substance analogues.

6           51. On October 11, 2017, the Chehalis Post office forwarded 28 Priority Mail  
7 parcels to the USPIS as suspicious. All 28 parcels listed "Harley Skyberg, PO Box 919,  
8 Chehalis, WA 98532" as the sender, and 24 of the 28 parcels had COD labels. The profile  
9 of the forwarded parcels was consistent with the previous SKYBERG parcels that  
10 contained controlled substances and/or controlled substance analogues.

11           52. I obtained four separate federal search warrants for these parcels. The  
12 parcels all contained packages and/or vials that were similar to the previously seized  
13 contents.

14           53. I selected a few of the seized pouches, packages, and vials, including the  
15 ones labeled "White Water Rapid," "White Lightning," "High Octane," "Snowman,"  
16 "Wicked Yeti," "Scooby Snax," "Klimax," "White Tiger," "Kush Extra," "Supergirl,"  
17 "iBrown," "Charles," "Fairly Legal," "AMPED," "Go Gaine," and "Eight Ballz," and  
18 sent them to the USPIS Forensic Laboratory Services in Dulles, VA for analysis. On  
19 August 31, 2018, I received a report back from the lab. The report indicated that all the  
20 substances submitted contained 3,4-tetramethylene-a-pyrrolidino-valerophenone (also  
21 known as TM alpha-PVP), 4-methylpentadron, FUB-AMB, N-ethylpentylone, 4-  
22 methyl-a-prryolidinohexiophenone (also known as 4-methyl-a-PHP), and/or 4-f-a-PHP.  
23 The report noted that 4-methylpentadron and N-ethylpentylone are structurally similar to  
24 pentadron and ethylone, respectively, both Schedule I controlled substances. In addition,  
25 according to the DEA, FUB-AMB is a type of synthetic cannabinoid and has been  
26 categorized as a Schedule I controlled substance since November 2017.

27           54. On December 27, 2017, the Chehalis Post office forwarded one incoming  
28 international parcel from Hong Kong, China, addressed to "Harley Skyberg, PO Box 919,

1 Chehalis, WA 98532” as suspicious. After receiving a positive alert from a narcotic K-9,  
 2 I obtained a federal search warrant for the parcel on January 12, 2018. Inside the parcel  
 3 was approximately 476 grams of a white powdery substance. I forwarded the substance  
 4 to the Washington State Patrol Crime Laboratory for analysis. The lab report indicated  
 5 that the substance contained 1-(4-methylphenyl)-2-(pyrrolidin-1-yl)hexan-1-one, also  
 6 known as MPHP. According to the DEA, MPHP is a type of synthetic cathinone that  
 7 was placed into Schedule I in July 2019.

8 **I. Postal Money Orders and Other Payment Methods**

9 55. In January 2018, I researched the USPS’s postal money order database and  
 10 identified at least 313 money orders that were made and mailed to SKYBERG by USPS  
 11 customers, including multiple individuals who were listed as the recipients on previously  
 12 seized SKYBERG parcels. Each money order was typically for several hundred dollars,  
 13 ranging anywhere from \$100 to \$500. The majority of these money orders were  
 14 forwarded to SKYBERG’s addresses listed on the parcels and ultimately deposited into  
 15 various bank accounts under SKYBERG’s control at various banking institutions.

16 56. I also reviewed records associated with SKYBERG’s bank accounts and  
 17 accounts at various payment processing service companies. I learned that SKYBERG  
 18 collected payments from his clients in multiple different ways, including through  
 19 payment services such as Stripe, Venmo, Western Union, Facebook, and even  
 20 cryptocurrency.

21 **J. SKYBERG’s Bitcoin Alpha-PVP Purchase**

22 57. In March 2018, I obtained from Coinbase records associated with a  
 23 Coinbase account owned by SKYBERG, User ID 59078b05cd453c0f0ce40573. Coinbase  
 24 is an online digital currency exchange that allows its users to buy, sell, store, and transfer  
 25 a number of cryptocurrencies, including Bitcoin.

26 58. A review of the account’s transaction records revealed that on June 23,  
 27 2017, SKYBERG, on three separate occasions, sent approximately 0.74, 0.74, and 0.81  
 28 Bitcoin to the same recipient. There was a corresponding note for each transaction. The

1 first transaction was accompanied with a note saying "Harley apvp order 3 ki." The  
2 second and third transactions were accompanied with an identical note saying "harley's  
3 apvp order." The value of Bitcoin transferred for each transaction was \$2,002.37,  
4 \$2,002.37, and \$2,202.37 at the time of the transaction, respectively.

5 **K. First Undercover Buy**

6 59. On March 26, 2018, Postal Inspector Nelson Rivera and I visited  
7 www.wickedherbals.guru. The website was still active. On the same day, I conducted an  
8 undercover buy from www.wickedherbals.guru and ordered one "WICKEDPLATTER:  
9 Wicked sampler platter 8 units research chemicals for \$169.99" and one "GOGAINE:  
10 GOGAINE Research Chemical Powder 500MG." After ordering, I received an email  
11 invoice from harley1skyberg@gmail.com. The invoice had a subject line that read "Order  
12 Confirmation Notice" and contained the invoice number, order date, payment, and items  
13 ordered. At the bottom of the invoice, there was a note saying that a customer could  
14 check the status of his or her order by visiting  
15 <http://www.wickedherbals.guru/myaccount.sc>. This order, however, never arrived.

16 60. On April 17, 2018, Inspector Rivera visited www.wickedherbals.guru and  
17 submitted an order for the same products.

18 61. On April 23, 2018, I received a Priority Mail COD parcel from SKYBERG  
19 at the undercover PO Box address. The COD label requested a payment of \$269.18,  
20 which was the amount due for the original order. I forwarded a postal money order for  
21 the same amount to SKYBERG and claimed the parcel. Inside the parcel was a package  
22 labeled "BUD FACTORY Mango Funk," which was not what Inspector Rivera had  
23 ordered.

24 62. On April 30, 2018, I received another Priority Mail parcel from SKYBERG  
25 at the undercover PO Box address, but this time without a COD label. The parcel  
26 contained the items Inspector Rivera had original ordered. The packaging and branding  
27 for the items were consistent with those for the items that had been previously seized from  
28 SKYBERG.

**L. Search of harley1skyberg@gmail.com**

AFFIDAVIT OF MYHRER- 16

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

63. In June 2018, I obtained a search warrant authorizing the search of harleylskyberg@gmail.com. In July 2018, I received a return from Google and reviewed the emails sent and received by harleylskyberg@gmail.com. Google identified "Harley Skyberg" as the account holder of harleylskyberg@gmail.com. Included in the return were approximately 2,000 emails received between November 2016 and October 2017 and titled "New Order Notice," which contained details about orders received by SKYBERG via www.wickedherbals.guru, such as invoice number, payments due, order date, and customer contact information. The total amount of payments due to SKYBERG according to these invoices exceeded \$600,000.

64. Also included in the return were SKYBERG's email communications with office@dharmachem.org during 2017. A Google search revealed that dharmachem.org was frequently mentioned as a supplier of "research chemicals" by internet users on a website such as Reddit. A similarly-named, China-based company "dharmachems.com" was also identified as a supplier of acetyl fentanyl, an analog of fentanyl, by the World Health Organization (WHO) in 2015.<sup>4</sup> Below are some of the representative email communications between SKYBERG and office@dharmachem.org:

a. On May 15, 2017, harleylskyberg@gmail.com sent an email to office@dharmachem.org: "Hello, This is the second email requesting a quote for 1 kilo th-pvp. Can you fill this order to the US? Harley."

b. On May 16, 2017, office@dharmachem.org replied to harleylskyberg@gmail.com: "Hello, Harley, we have good apvp analogue, TH-PVP is weak compare [sic] to new apvp analogue. do you need exactly th-pvp? new apvp analogue stronger and price is higher than th-pvp. Yes, we guarantee successful delivery to US. Best regards, Angel Hao."

<sup>4</sup> Expert Committee on Drug Dependence, World Health Organization, Acetyl fentanyl Critical Review Report (Nov. 2015), [http://www.who.int/medicines/access/controlled-substances/5.2\\_Acetyl fentanyl\\_CREv.pdf](http://www.who.int/medicines/access/controlled-substances/5.2_Acetyl fentanyl_CREv.pdf).

c. On May 16, 2017, harley1skyerg@gmail.com replied to office@dharmachem.org: "I would like the best PVP possible, as long as its white. I would also like ½ kilo of the MPD too. Can I get the combined price and ill pay today."

d. On May 17, 2017, office@dharmachem.org replied to harley1skyberg@gmail.com: "apvp best analogue USD 2000/kg, 4MPD USD 1750/kg, USD 3650 total, shipping cost included. Please send Bitcoins to the following address, 1CD2hcXXyEQCH3mzXP7sD9i8TZqWfa8L42 . . . After arrang[ing] the payment, pls confirm it and provide the following info: The contact telephone No. (for courier service), the shipping address and consignee name."

e. On May 17, 2017, harley1skbyerg@gmail.com replied to office@dharmachem.org: "Hello, I sent \$2000USD through bitcoin for the APVP and MPD order. I will be sending another \$1650usd immediately from a different bitcoin wallet. Please send 2 kilos total to the address below. Once I received these two, I will immediately order two more kilos, and continue this process hopefully for a long time. My phone number is: 619.796.8108. My address is: Harley Skyberg, PO box 5574, New York, NY 10185, USA, 619-796-8108. Thank you in advance for your honest business practices."

f. Later the same day, harley1skbyerg@gmail.com replied to office@dharmachem.org with the following: "Full amount paid for : 1 kilo APVP, 1 Kilo MPD. THANKS." Attached to the email were screenshots showing bitcoin payments.

**M. chinglabs575@gmail.com and theharleyskyberg@gmail.com**

65. I have also received emails seized from a Google email account chinglabs575@gmail.com pursuant to a search warrant filed in the Southern District of Mississippi in December 2016 as part of the investigation on a Chinese drug supplier known as "Ching Labs."<sup>5</sup> The emails I obtained included emails directly exchanged

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<sup>5</sup> An open source search of Ching Labs showed a Facebook page of the company with a description that says: "Our products are not offered for human consumption. Highest quality guarantee" [sic] and the website of <https://chinglabs.com>. The picture on the Ching Labs Facebook page also had a caption: "Ching Labs: Chinese Research Chemical Vendor."

1 between "Sarah Zhang" at chinglabs575@gmail.com and "Harley Skyberg" at  
 2 theharleyskyberg@gmail.com in September 2016.

3 66. One such email, sent from theharleyskyberg@gmail.com to  
 4 chinglabs575@gmail.com on September 13, 2016 said: "Thank you for responding.  
 5 Please send asap, I have several hundred orders backed up right now. Also, how many  
 6 total shipments for the kilo are you sending? The address is: Harley Skyberg, PO box  
 7 574, New York, NY 10185, USA, PH#619.319.8775. As soon as [I] receive this full  
 8 shipment I'm already prepared to purchase another one immediately. I await the tracking  
 9 number(s).. Thanks again, Harley Skyberg, Nitefire Distribution, LLC."

10 67. On September 17 and 18, 2016, the two again exchanged a series of emails  
 11 about ordering and shipping controlled substances and/or controlled substance analogues  
 12 from China. A September 17, 2016 email from chinglabs575@gmail.com to  
 13 theharleyskyberg@gmail.com stated: "We can send you 1kg 4f-php, if you received my  
 14 last email and I will add 100g th-a-Pvp to it to compare the quality. I asked and it seems  
 15 the order can't be changed because we only have 0,5 kg in stock of th-a-pvp, and my boss  
 16 didn't order more because it doesn't sell as well as 4-cl-pvp and 4f-php. Dear we have  
 17 also a new stimulant the new apvp version large crystal appp if you want I can add also a  
 18 very small sample of that."

19  
 20  
 21  
 22 Ching Labs was also a subject of a media investigation by NBC News. According to a news story published  
 23 by NBC Nightly News in August 2017, an NBC journalist googled "buy fentanyl" and Ching Labs was the first  
 24 company that appeared on the search result page. The journalist, using an alias "Richard Stevens," then sent an  
 25 online message to Ching Labs, which said: "I am interested in getting fentanyl sent to us in the United States."

26 Within minutes, the journalist received an email response from Ching Labs, which said: "Hello, we have a very  
 27 potent fentanyl analogue, very similar in potency to the original. We ship to USA. We only accept bitcoin as  
 payment method."

28 The journalist then followed up with another email, which said: "Is it possible to get it to me without it  
 being taken by U.S. customs?" Again, within minutes, the journalist received an email response, which said: "We  
 provide a reship guarantee, also we ship using ingenious packaging. My name is Sarah, nice meeting you, Mr.  
 Richard :)"

The journalist sent another follow up email: "That is great news, Sarah. Would you be willing to send me a  
 picture of the packaging?" Approximately ten minutes later, the journalist received an email with a picture  
 describing the typical packaging of fentanyl.



68. theharleyskyberg@gmail.com emailed back on the same day and said: "I would prefer a kilo of any good variation of PVP." On September 18, 2016, the communication between the two continued with chinglabs575@gmail.com saying: "Ok dear we will send the new APPP[.] The 4f-php most probably will become illegal soon[.] Regards." theharleyskyberg@gmail.com wrote back, asking: "Do you have the pvp analog? Are you shipping today?" chinglabs575@gmail.com responded and said: "They will send the APPP instead from the lab. The 4f-php batch did not crystallise [sic] and they lost the batch. They said it would take longer and was not possible to send out on Monday so we decided to cancel the synthesis for the 4f-php and send appp instead, which is already finished the synthesis."

**N. Search of theharleyskyberg@gmail.com**

69. Based on the evidence described above, I obtained a federal search warrant for theharleyskyberg@gmail.com on September 10, 2019. I subsequently received a return from Google. Google records confirmed that the account holder of theharleyskyberg@gmail.com was "Harley Skyberg." I found the following representative email exchanges between theharleyskyberg@gmail.com and his drug suppliers:

a. On March 11, 2015, theharleyskyberg@gmail.com sent an email to "Vincent:" "Do your [sic] have tracking numbers for the other two products? Also when will you have 3-Mmc I'm ready to order a kilo of 3-mmc. Also, please keep me informed on any upcoming compounds that you will be producing. The rcs I need most are Shhh...MDPV, BK-MDMA, A-Pvp, Pentylone, Flephedrone, Methoxetamine or Methophenedrine, 2-FMC, 3-FMC, 2-FA, 2-ce, MeoPPP, 5-meo-mipt, 4-FMA, ANY NEW RC. thanks, and can I get the tracking numbers for the two other orders. Then as soon as the new batch is ready let me know. Also, check out the apps Xoom, and Transwise I believe."

b. On June 28, 2016, theharleyskyberg@gmail.com sent an email to chanapril@hotmail.com and said: "Can I please get a quote for: 2 kilos 4c-pvp[.] 1 kilo

1 ab-chiminaca.” “April Chan,” using chanapril@hotmail.com, responded: “Hi, 4c-pvp is  
 2 1700/kg and ab-c is 1900/kg. Could you please let me know did you ever order 4c-pvp  
 3 before? It’s similar with apvp, but I think 4f-php is better than 4c, I just judge it by their  
 4 sales. 4f is 1650/kg.”

5 c. On July 13, 2016, thecharleskyberg@gmail.com replied back to  
 6 chanapril@hotmail.com and said: “Hello, Please send me one kilo 4F-PhP. I sent  
 7 USD\$1600 via Western [U]nion. Send to: Harley Skyberg[,] Nitfire Distribution, LLC,  
 8 PO BOX 1163, Chehalis, WA 98532. The MTCN is: 823-792-2339[.] As soon as I get a  
 9 confirmed tracking number. I will order another kilo for a total of 5. Thank you. Harley.”

10 **O. Additional Undercover Buys**

11 70. On October 16, 2019, I conducted an undercover buy from  
 12 wickedherbals.guru. I ordered “4F-PVPP” and “Beak UK Premium Research Chemical  
 13 Snuff.” On the same day, I received an email order confirmation from “Harley Skyberg”  
 14 at harleyskyberg87@gmail.com. On October 18, 2019, I received an email from  
 15 stamps.com, “at the request of Harley Skyberg,” with tracking number 9403 3118 9922  
 16 3580 2270 59. On October 21, 2019, I received an email from USPS stating the parcel  
 17 had arrived at the undercover address. On October 23, 2019, Postal Inspector Harrold  
 18 picked up the parcel and opened it. Inside the parcel were the items ordered, consistent in  
 19 their visual with previously-seized items from SKYBERG.

20 71. On October 28, 2019, Postal Inspector Michael Fischlin conducted another  
 21 undercover buy from wickedherbals.guru. Inspector Fischlin ordered “3C-MMC ULTRA  
 22 RARE RESEARCH CHEMICAL .5G” and “4F-FLORPHENIDATE ULTRA RARE  
 23 RESEARCH CHEMICAL .5G.” On the same day, I received an email order confirmation  
 24 from “Harley Skyberg” at harleyskyberg87@gmail.com. I replied to the email and said I  
 25 would like to pay with bitcoin. Later the same day, “Harley Skyberg” at  
 26 harleyskyberg87@gmail.com responded with a screenshot of a bitcoin wallet address of  
 27 14xbKCJrmeu5PftMOUSgV8Yw3mmraMxfqs. I arranged the bitcoin payment to be  
 28 made to the wallet address provided by SKYBERG.



1       72. On October 30, 2019, I received an email from stamps.com, "at the request  
2 of Harley Skyberg," with tracking number 9405 5118 9922 3549 7294 11. On November  
3 4, 2019, USPS tracking records indicated that the parcel had been accepted in Vancouver,  
4 WA and would be delivered to the undercover address by Wednesday, November 6,  
5 2019.

6 **P. Identification of the SUBJECT STORAGE UNITS 1 and 2**

7       73. As described above, I have obtained and reviewed bank records associated  
8 with multiple bank accounts under SKYBERG's control in the course of this  
9 investigation. From the review of those bank records, I have learned that SKYBERG has  
10 been making regular payments to multiple storage facilities.

11       74. The bank records I most recently reviewed were for SKYBERG's US Bank  
12 account \*6229 from October 2018 to February 2019. The records showed that during the  
13 period, SKYBERG made monthly payments to Northwest Self Storage located in Kelso,  
14 WA, and a storage facility in Lacey, WA.

15       75. In November 2019, I obtained records from the Kelso branch of Northwest  
16 Self Storage, located at 1699 13<sup>th</sup> Ave S, Kelso, WA 98626. The records, which included  
17 activity and transaction logs and payment records, identified SKYBERG as the current  
18 tenant of Unit D245 (SUBJECT STORAGE UNIT 2) and showed that SKYBERG had  
19 been regularly accessing it since November 2016. The most recent access to SUBJECT  
20 STORAGE UNIT 2 by SKYBERG was August 31, 2019. The payment records also  
21 matched SKYBERG's US Bank records.

22       76. Also in November 2019, I obtained records from Express Storage, located  
23 at 5200 Lacey Blvd SE, Lacey, WA 98504. The records, which included a rental  
24 agreement, payment records, and activity and transaction logs, identified SKYBERG as  
25 the current occupant of Room 259 (SUBJECT STORAGE UNIT 1) and showed that  
26 SKYBERG had been renting a storage unit at the location since September 2014. The  
27 payment records also matched SKYBERG's US Bank records.

77. As described further below, drug traffickers frequently utilize storage units to store drugs, drug processing equipment, or to otherwise facilitate their drug trafficking operations. I know, from my observations and review of various records, that SKYBERG, in particular, resides in a small mobile home and frequently changes his residential location. Combined with the fact that SKYBERG has been maintaining multiple storage units for years, this makes it likely that the SUBJECT STORAGE UNITS contain evidence of SKYBERG's drug trafficking activities.

**Q. Surveillance and Tracking of SKYBERG and Identification of the SUBJECTIVE PREMISES, SUBJECT VEHICLES 1 and 2, and SUBJECT STORAGE UNIT 3**

78. On July 26 and 27, 2018, I conducted surveillance at SKYBERG's mobile home, located at the time inside a RV park at 150 Happy Trails Road, Castle Rock, WA 98632. I had previously located SKYBERG's mobile home from a return address on one of SKYBERG's outgoing parcels. In the course of this two-day surveillance, I observed SKYBERG driving both SUBJECT VEHICLES 1 and 2.

79. On August 20, 2019, I conducted surveillance at SKYBERG's mobile home, now located inside a RV Park at 7603 NE 13<sup>th</sup> Ave, Lot 120, Vancouver, WA 98665 (SUBJECT PREMISES). I had previously identified this RV park as SKYBERG's potential location based on the locations of mailing facilities used by SKYBERG to ship and receive his mail items.

80. Parked adjacent to the SUBJECT PREMISES were SUBJECT VEHICLE 1 and SUBJECT VEHICLE 2. SUBJECT VEHICLE 2 had two bikes attached to a bike rack. Later that day, around 12:13 p.m. I saw a male I identified as SKYBERG, based on my previous review of his pictures, leaving the RV park in SUBJECT VEHICLE 1 and turned right onto NE 13<sup>th</sup> Ave. SUBJECT VEHICLE 1 then turned right onto NE 78<sup>th</sup> Street, going under I-5, before turning right on to NE 6<sup>th</sup> Ave. I was able to locate SUBJECT VEHICLE 1 in a parking lot outside of a Safeway grocery store. At

1 approximately 12:20 p.m., SKBYERG got back into SUBJECT VEHICLE 1 and  
2 departed the Safeway parking lot. I was unable to keep up with SKBYERG.

3 81. I continued my surveillance on August 22, 2019. At around 10:00 a.m. I  
4 noticed that SUBJECT VEHICLE 1 was not parked in front of the SUBJECT  
5 PREMISES. SUBJECT VEHICLE 2 was parked in front of the SUBJECT PREMISES  
6 and no longer had the two bicycles attached to its back. As I drove past the SUBJECT  
7 PREMISES, I noticed SKYBERG driving SUBJECT VEHICLE 1 and approaching the  
8 RV park toward my direction. I drove around the RV park. When I got back to  
9 SKYBERG's residence, both SUBJECT VEHICLES were parked in front of the  
10 SUBJECT PREMISES. I did not see SKBYERG leave the SUBJECT PREMISES again  
11 that day.

12 82. I subsequently spoke to the owners of the RV park and confirmed that  
13 SKYBERG was the sole occupant of the SUBJECT PREMISES. I also did not see  
14 anyone else entering or coming out of the SUBJECT PREMISES or driving the  
15 SUBJECT VEHICLES during my two-day surveillance.

16 83. On September 30, 2019, I obtained a federal tracking warrant for  
17 SUBJECT VEHICLES 1 and 2. I installed the GPS trackers on both vehicles on October  
18 2, 2019 and began reviewing SKYBERG's travel patterns. Below is a sample of some of  
19 the notable travel patterns I observed during the duration of the tracking:

20 a. On October 16, 2019, at approximately 2:38 p.m., SUBJECT  
21 VEHICLE 1 left the SUBJECT PREMISES. It stopped near the intersection of E 7<sup>th</sup> St  
22 and Main Street in Vancouver, WA, and then traveled and stopped at the United States  
23 Post Office located at 1211 Daniels Street, Vancouver, WA 98666 (hereinafter "Daniels  
24 Street Post Office") at approximately 3:57 p.m. The post office later notified me that it  
25 had received five Priority Mail parcels that listed the return address as "Harley Skyberg,  
26 PO Box 239, Vancouver, WA 98665 (SUBJECT PO BOX)" on October 16, 2019. The  
27 parcels shared the same profile with the previously seized SKYBERG parcels.  
28

1           b.       On October 18, 2019, at approximately 3:10 p.m., SUBJECT  
 2 VEHICLE 1 left the SUBJECT PREMISES. It stopped at a 7-Eleven gas station and  
 3 traveled south. It then stopped on one street over from the Daniels Street Post Office. I  
 4 was later notified that the parcel containing the October 16 undercover order and listing  
 5 the return address of "Harley Skyberg, PO Box 239, Vancouver, WA 98665 (SUBJECT  
 6 PO BOX)" was received by the Daniels Street Post Office on October 18, 2019.

7           c.       On November 4, 2019, at approximately 2:55 p.m., SUBJECT  
 8 VEHICLE 2 left the SUBJECT PREMISES. It stopped outside of the SUBJECT PO  
 9 BOX. It next stopped at a Northwest Self Storage location at 7523 NE Hwy 99 Suite A,  
 10 Vancouver, WA 98665 (SUBJECT STORAGE UNIT 3). It then traveled and stopped at  
 11 the United States Post Office located at 2700 Caples Avenue, Vancouver, WA 98661. I  
 12 was later notified that the parcel containing the October 28 undercover order and listing  
 13 the return address of "Harley Skyberg, PO Box 239, Vancouver, WA 98665 (SUBJECT  
 14 PO BOX)" was received by the Caples Avenue Post Office on October 16, 2019.

15       85.       On November 5, 2019, I obtained records from the Northwest Self Storage  
 16 location at 7523 NE Hwy 99 Suite A, Vancouver, WA 98665 (SUBJECT STORAGE  
 17 UNIT 3). The records confirmed that SKYBERG began leasing Storage unit #B190 at the  
 18 location on November 4, 2019.

19       84.       In all three examples discussed above, SKYBERG started from the  
 20 SUBJECT PREMISES, drove one of the SUBJECT VEHICLES, and eventually ended  
 21 up at a post office, where parcels originated from SKYBERG and suspected to contain  
 22 controlled substances and/or controlled substance analogues were received on the same  
 23 day. This makes it likely that the SUBJECT PREMISES holds drugs distributed by  
 24 SKYBERG and that the SUBJECT VEHICLES are used to transport such drugs to postal  
 25 locations for mailing.

26 **R.     Digital Devices**

27       85.       As discussed further below, digital devices in drug traffickers' possession,  
 28 including cellphones, computers, and tablets, can reveal valuable evidence of drug

1 trafficking. This is particularly true in SKYBERG's case. As described above,  
2 SKYBERG relies heavily on the internet and emails to advertise and distribute his drugs,  
3 as well as to communicate with co-conspirators and suppliers. Because digital devices are  
4 used to send and receive emails and access the internet, it is likely that any digital device  
5 located during the search of the SUBJECT PREMISES, SUBJECT VEHICLES,  
6 SUBJECT STORAGE UNITS, and/or SUBJECT PO BOX contains evidence of  
7 SKYBERG's drug trafficking activities.

8 **TACTICS USED BY DRUG TRAFFICKERS**

9 86. Based upon my training, experience, and participation in this and other  
10 investigations involving drug trafficking, my conversations with other experienced  
11 investigators and law enforcement investigators with whom I work, and interviews of  
12 individuals who have been involved in the trafficking of methamphetamine, heroin,  
13 cocaine and other drugs, I have learned and know the following.

14 87. Drug traffickers often use "stash houses" to conceal their illegal activities  
15 and contraband. Such stash houses allow drug traffickers to keep their contraband at a  
16 hidden location, where they may not live, thereby making it more difficult for law  
17 enforcement and/or competitors to identify these locations where drugs and drug  
18 proceeds may be hidden.

19 88. It is common for drug traffickers to hide proceeds of illegal drug sales and  
20 records of illegal drug transactions in secure locations within their residences, stash  
21 houses, storage units, garages, outbuildings and/or vehicles on the property for their  
22 ready access and to conceal them from law enforcement authorities.

23 89. It is common to find papers, letters, billings, documents, and other writings,  
24 which show ownership, dominion, and control of businesses, residences, and/or vehicles  
25 in the residences, stash houses, storage units, garages, outbuildings and/or vehicles of  
26 drug traffickers. Items of personal property that tend to identify the persons in residence,  
27 occupancy, control, or ownership of the premises also include canceled mail, deeds,  
28 leases, rental agreements, photographs, personal telephone books, diaries, utility and

1 telephone bills, statements, identification documents, keys, financial papers, rental  
2 receipts and property ownership papers, personal and business telephone and address  
3 books and telephone toll records, and other personal papers or identification cards in the  
4 names of subjects involved in the criminal activity being investigated.

5 90. Drug traffickers frequently amass large amounts of proceeds, in the form of  
6 cash, from the illegal sale of drugs that they attempt to legitimize or "launder." To  
7 accomplish this goal, drug traffickers use financial institutions and their attendant  
8 services, securities, cashier's checks, safe deposit boxes, money drafts, real estate, shell  
9 operations, and business fronts. Persons involved in drug trafficking and/or money  
10 laundering keep papers relating to these activities for future reference, including federal  
11 and state tax records, loan records, mortgages, deeds, titles, certificates of ownership,  
12 records regarding investments and securities, safe deposit box rental records and keys,  
13 and photographs. I know from my training and experience that often items of value are  
14 concealed by persons involved in large-scale drug trafficking inside of safes, lock boxes,  
15 and other secure locations within their residences, outbuildings, and vehicles.

16 91. Drug traffickers often place assets in names other than their own to avoid  
17 detection by investigative/police agencies, and even though these assets are in the names  
18 of other individuals or businesses, the drug traffickers actually own and continue to use  
19 these assets and exercise dominion and control over them.

20 92. Drug traffickers often document aspects of their criminal conduct through  
21 photographs or videos of themselves, their associates, their property, and their products,  
22 including drugs and drug proceeds. Drug traffickers usually maintain these photographs  
23 or videos in their possession.

24 93. Drug traffickers often maintain large amounts of US currency in order to  
25 maintain and finance their ongoing illegal drug trafficking business. Often, drug  
26 traffickers from other countries operating in the United States use wire remitters and bulk  
27 cash transfers to transfer currency to co-conspirators living in other states or countries.  
28



1           94. Drug traffickers commonly have in their possession, on their person, and at  
2 their residences and/or in their storage units, firearms and other weapons, which are used  
3 to protect and secure their property.

4           95. Drug traffickers use mobile electronic devices including cellular telephones  
5 and other wireless communication devices to conduct their illegal activities. For example,  
6 traffickers of controlled substances commonly maintain records of addresses, vehicles, or  
7 telephone numbers that reflect names, addresses, vehicles, and/or telephone numbers of  
8 their suppliers, customers and associates in the trafficking organization. It is common to  
9 find drug traffickers keeping such records of said associates in cellular telephones and  
10 other electronic devices. Drug traffickers frequently change their cellular telephone  
11 numbers to avoid detection by law enforcement, and it is common for drug traffickers to  
12 use more than one cellular telephone at any one time.

13           96. Drug traffickers use cellular telephones to maintain contact with their  
14 suppliers, distributors, and customers. They prefer cellular telephones because, first, they  
15 can be purchased without the location and personal information that landlines require.  
16 Second, they can be easily carried to permit the user maximum flexibility in meeting  
17 associates, avoiding police surveillance, and traveling to obtain or distribute drugs.  
18 Third, they can be passed between members of a drug conspiracy to allow substitution  
19 when one member leaves the area temporarily. Since the use of cellular telephones  
20 became widespread, every drug trafficker with which I have interacted has used one or  
21 more cellular telephones for his or her drug business. I also know that it is common for  
22 drug traffickers to retain in their possession cellular phones that they previously used, but  
23 have deactivated or discontinued using. Based on my training and experience, the data  
24 maintained in a cellular telephone used by a drug trafficker is often evidence of a crime  
25 or crimes. This includes the following:

26           a. The assigned number to the cellular telephone (known as the mobile  
27 directory number or MDN), and the identifying telephone serial number (Electronic  
28 Serial Number, or ESN), (Mobile Identification Number, or MIN), (International Mobile

1 Subscriber Identity, or IMSI), or (International Mobile Equipment Identity, or IMEI) are  
2 important evidence because they reveal the service provider, allow us to obtain subscriber  
3 information, and uniquely identify the telephone. This information can be used to obtain  
4 toll records, to identify contacts by this telephone with other cellular telephones used by  
5 co-conspirators, to identify other telephones used by the same subscriber or purchased as  
6 part of a package, and to confirm if the telephone was contacted by a cooperating source.

7           b.     The stored list of recent received calls and sent calls is important  
8 evidence. It identifies telephones recently in contact with the telephone user. This is  
9 valuable information in a drug investigation because it will identify telephones used by  
10 other members of the organization, such as suppliers, distributors and customers, and it  
11 confirms the date and time of contacts. If the user is under surveillance, it identifies what  
12 number he called during or around the time of a drug transaction or surveilled meeting.  
13 Even if a contact involves a telephone user not part of the conspiracy, the information is  
14 helpful (and thus is evidence) because it leads to friends and associates of the user who  
15 can identify the user, help locate the user, and provide information about the user.  
16 Identifying a defendant's law-abiding friends is often just as useful as identifying his  
17 drug-trafficking associates.

18           c.     Stored text messages are important evidence, similar to stored  
19 numbers. Agents can identify both drug associates, and friends of the user who likely  
20 have helpful information about the user, his location, and his activities.

21           d.     Photographs on a cellular telephone are evidence because they help  
22 identify the user, either through his or her own picture, or through pictures of friends,  
23 family, and associates that can identify the user. Pictures also identify associates likely to  
24 be members of the drug trafficking organization. Some drug traffickers photograph  
25 groups of associates, sometimes posing with weapons and showing identifiable gang  
26 signs. Also, digital photos often have embedded "geocode" information within them.  
27 Geocode information is typically the longitude and latitude where the photo was taken.  
28 Showing where the photo was taken can have evidentiary value. This location



1 information is helpful because, for example, it can show where coconspirators meet,  
2 where they travel, and where assets might be located

3 e. Stored address records are important evidence because they show the  
4 user's close associates and family members, and they contain names and nicknames  
5 connected to phone numbers that can be used to identify suspects.

6 97. It is common for drug traffickers to possess drugs, drug paraphernalia, and  
7 other items which are associated with the sale and use of controlled substances such as  
8 scales, containers, cutting agents, and packaging materials in their residences, stash  
9 houses, storage units, garages, outbuildings and/or vehicles on their property.

10 98. Drug traffickers frequently try to conceal their identities by using  
11 fraudulent names and identification cards. Once identities have been created or stolen  
12 from other citizens, drug traffickers use those identifications to falsify records such as  
13 Department of Licensing records and phone records for the purpose of theft of services  
14 and to evade detection by law enforcement.

15 99. It is a common practice for drug traffickers to maintain records relating to  
16 their drug trafficking activities in their residences, stash houses, storage units, garages,  
17 outbuildings and/or vehicles. Because drug traffickers in many instances will "front" (that  
18 is, sell on consignment) controlled substances to their associates, or alternatively, will be  
19 "fronted" these items from their suppliers, such record keeping is necessary to keep track  
20 of amounts paid and owed, and such records will also be maintained close at hand so as  
21 to readily ascertain current balances. These records include "pay and owe" records to  
22 show balances due for drugs sold in the past (pay) and for payments expected (owe) as to  
23 the trafficker's suppliers and distributors, telephone and address listings of clients and  
24 suppliers, and records of drug proceeds. These records are commonly kept for an  
25 extended period.

26 100. Drug traffickers maintain books, records, receipts, notes, ledgers, airline  
27 tickets, money orders, and other papers relating to the transportation and distribution of  
28 controlled substances. These documents whether in physical or electronic form, are

1 maintained where the traffickers have ready access to them. These documents include  
2 travel records, receipts, airline tickets, auto rental agreements, invoices, and other  
3 memorandum disclosing acquisition of assets and personal or business expenses. I also  
4 know that such records are frequently maintained in drugs traffickers' residences, stash  
5 houses, storage units, garages, outbuildings and/or vehicles.

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1 **CONCLUSION**

2 101. Based on the foregoing, I believe there is probable cause that evidence,  
3 fruits, and instrumentalities of possession of controlled substances with intent to  
4 distribute, in violation of Title 21, United States Code, Section 841(a)(1), are located at  
5 the SUBJECT PREMISES, SUBJECT VEHICLES, SUBJECT STORAGE UNITS, and  
6 SUBJECT PO BOX as more fully described in Attachment A1 through A7 to this  
7 Affidavit, as well as on and in any digital devices or other electronic storage media found  
8 at the SUBJECT PREMISES. I therefore request that the Court issue a warrant  
9 authorizing a search of the SUBJECT PREMISES, SUBJECT VEHICLES, SUBJECT  
10 STORAGE UNITS, and SUBJECT PO BOX, as well as any digital devices and  
11 electronic storage media located therein, for the items more fully described in Attachment  
12 B, incorporated herein by reference, and the seizure of any such items found therein.

13 

14  
15  
16 KIMBERLY MYHRER  
17 U.S. Postal Inspector, USPIS  
18

19 SUBSCRIBED AND SWORN to before me this 6<sup>th</sup> day of November, 2019.  
20

21 

22 DAVID W. CHRISTEL  
23 U.S. MAGISTRATE JUDGE  
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**ATTACHMENT A1**  
**Premises to be searched**

SKYBERG's residence located at 7603 NE 13<sup>TH</sup> Ave, Lot 120, Vancouver,  
Washington 98665 and associated curtilage (hereinafter "SUBJECT PREMISES")

ATTACHMENT A1  
ITEMS TO BE SEIZED

**ATTACHMENT A2**  
**Vehicle to be Searched**

A white 2015 Mercedes Benz SD with Washington license plate BHF6374 and vehicle identification number (VIN) WDDSJ4EB3FN213498, registered to SKYBERG (hereinafter "SUBJECT VEHICLE 1")

ATTACHMENT A2  
ITEMS TO BE SEIZED

**ATTACHMENT A3**  
**Vehicle to be Searched**

A white 2012 Toyota FJ Cruiser with Washington license plate BHR4637 and vehicle identification number (VIN) JTEBU4BF0CK146246, registered to SKYBERG (hereinafter "SUBJECT VEHICLE 2")

ATTACHMENT A3  
ITEMS TO BE SEIZED

**ATTACHMENT A4**

**Place to be Searched**

Storage unit # 259 at Express Storage, 5200 Lacey Blvd SE, Lacey, WA  
98504, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 1")

ATTACHMENT A4  
ITEMS TO BE SEIZED



**ATTACHMENT A5**

**Place to be Searched**

Storage unit # D245 at Northwest Self Storage, 1699 13<sup>th</sup> Ave S, Kelso, WA  
98626, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 2")

ATTACHMENT A5  
ITEMS TO BE SEIZED

**ATTACHMENT A6**

**Place to be Searched**

Storage unit #B190 at Northwest Self Storage, 7523 NE Hwy 99 Suite A, Vancouver,  
WA 98665, occupied by SKYBERG (hereinafter "SUBJECT STORAGE UNIT 3")

ATTACHMENT A6  
ITEMS TO BE SEIZED

**ATTACHMENT A7**

**Place to be Searched**

A Post Office Box 239 located at 7720 NE Hwy 99, D, Vancouver, Washington  
98665, currently being used by SKYBERG (hereinafter "SUBJECT PO BOX")

ATTACHMENT A7  
ITEMS TO BE SEIZED

**ATTACHMENT B**  
**Items to be Seized**

The following items that constitute evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section 841(a)(1), possession of controlled substances with intent to distribute:

1. Controlled substances and controlled substance analogues, including, but not limited to, synthetic cathinones, synthetic cannabinoids, cocaine, crack cocaine, heroin, hashish, marijuana, methamphetamine, MDMA, methadone, oxycodone, and Oxycotin;

2. Monetary instruments, including but not limited to, currency, money orders, bank checks, or gift cards;

3. Bank and financial account information including bank statements, deposit tickets, canceled checks, certificates of deposits, safe deposit box rental agreements and entrance logs, credit card statements and financial statements for domestic and foreign bank accounts, copies of money orders and cashier's checks, records reflecting domestic and/or international wire transfers, and records reflecting cryptocurrency transactions;

3. Controlled substance-related paraphernalia;

4. Documentary evidence, in whatever form, relating to the purchase, sale, and/or distribution of controlled substances;

5. Documents and other items tending to show the existence of other stored drugs, including rental agreements, receipts, keys, notes, and maps specially concerning off-site storage rooms and/or lockers;

6. Notes, letters and other items which communicate information identifying the sender and/or recipient or pertaining to the contents of the mailing;

7. Any evidence of the use of the US Mails in the distribution of controlled substances including, but not limited to, receipts, money orders, shipping labels and packaging materials, postal money orders, and/or DVD cases;

8. Address books, daily logs, daily telephone diaries, calendars, and appointment books;

ATTACHMENT B  
ITEMS TO BE SEIZED

1           9.     Digital computing devices, *e.g.*, desktop and laptop computers, digital  
2 storage devices, *e.g.*, external hard drives and USB thumb drives, and optical and  
3 magnetic storage media, *e.g.*, Blue Ray discs, DVDs and CDs.

4           10.    Weapons to include rifles, shotguns, knives, and handguns, as well as  
5 ammunition, shell casings, bullets, magazines, cleaning equipment, holsters, gun boxes  
6 and cases, trigger locks, gun safes, gun parts and tools, targets, receipts, and bills of sale;

7           11.    Cellular telephones and other communication devices including Blackberry,  
8 Android, Galaxy, iPhone, iPad and similar devices, may be seized and searched for the  
9 evidence, instrumentalities, or fruits of violations of Title 21, United States Code, Section  
10 841(a)(1), possession of controlled substances with intent to distribute, including the  
11 following items:

12               a.     Assigned number and identifying telephone serial number (ESN,  
13 MIN, IMSI, or IMEI);

14               b.     Stored lists of recent received, sent, or missed calls;

15               c.     Stored contact information;

16               d.     Photographs related to the aforementioned crimes of investigations,  
17 or photographs that may show the user of the phone and /or co-conspirators, including  
18 any embedded GPS data associated with the photographs;

19               e.     Stored text messages related to the aforementioned crime of  
20 investigations, including Apple messages, Blackberry Messenger messages or other  
21 similar messaging services or applications where the data is stored on the telephone;

22               f.     Notes; draft, sent, and received emails related to the aforementioned  
23 crimes of investigation;

24               g.     Evidence of user attribution showing who used or owned the digital  
25 device at the time of the things described in this warrant were created, edited, or delated,  
26 such as logs, phonebooks, saved usernames and passwords, documents and browsing  
27 history;

28               h.     Records of Internal Protocol addresses used and records of Internet  
activity, including firewall logs, caches, browsing history an cookies, "bookmarked" or  
"favorite" web pages, search terms the user entered into any Internet search engine, and  
records of user-typed web address.

ATTACHMENT B  
ITEMS TO BE SEIZED

1 As used above, the terms "records" and "information" included all of the  
2 foregoing items of evidence in whatever form and by whatever means they may have  
3 been created or stored, including any form of computer or electronic storage (such as  
4 flash memory or other media that can store data) and any photographic form, including  
5 emails, photographs, text messages, information contained in application or "apps," and  
6 calendar entries.

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28 ATTACHMENT B  
ITEMS TO BE SEIZED